

# Exhibit 2

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 \_\_\_\_\_ ) Case No.  
8 ) 1:17-MD-2804  
9 )  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12 )

13 FRIDAY, OCTOBER 26, 2018

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Stephan  
18 Kaufhold, held at the offices of LIEFF  
19 CABRASER HEIMANN & BERNSTEIN, LLP, 250 Hudson  
20 Street, 8th Floor, New York, New York,  
21 commencing at 12:03 p.m., on the above date,  
22 before Carrie A. Campbell, Registered  
23 Diplomat Reporter and Certified Realtime  
24 Reporter.

25 - - -

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1 MR. MELAMED: I just want to  
2 clarify. I think you are -- is it  
3 true that he was offered to talk about  
4 corporation -- the organization of the  
5 corporation and -- vis-à-vis opioids?

6 MS. LEVY: This witness is  
7 offered on the three topics that we've  
8 offered him on. You know what they  
9 are.

10 MR. MELAMED: Okay. So I'll  
11 reask the question. You can object,  
12 and then I'd like you to answer.

13 QUESTIONS BY MR. MELAMED:

14 Q. What Allergan PLC entity works  
15 on issues related to suspicious monitoring of  
16 the sales of Allergan's opioids?

17 MS. LEVY: Objection. Beyond  
18 the scope of what this witness has  
19 been offered to testify about.

20 As you know, Counsel, we have  
21 other corporate representatives who  
22 have been designated to testify about  
23 that topic.

24 THE WITNESS: I do not know.  
25

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1 QUESTIONS BY MR. MELAMED:

2 Q. You previously testified that  
3 there are approximately 1,300 people who work  
4 in the Madison, New Jersey, administrative  
5 headquarters of Allergan PLC?

6 A. Approximately.

7 Q. Who employs those individuals?

8 A. I do not know.

9 Q. You said you're employed by  
10 Allergan Sales, LLC, correct?

11 A. That is correct.

12 Q. Do you know who employs the  
13 executives of Allergan PLC?

14 A. I do not know.

15 Q. Do you know who employs anybody  
16 else in the building?

17 Without naming anybody, do you  
18 know who employs anybody else in the building  
19 at Madison -- in Madison?

20 A. Well, certain groups, yes.

21 Q. What groups?

22 A. Well, for example, people who  
23 report to me as part of the treasury  
24 function, they would also be employees of  
25 Allergan Sales, LLC. Same with the other

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1 finance functions as well, too.

2 Q. What other finance -- are all  
3 the finance functions for the entirety of  
4 Allergan PLC within the Allergan Sales, LLC,  
5 entity?

6 A. Rephrase that, please?

7 Q. You said -- I -- it was an  
8 inartfully phrased question. I'm trying to  
9 follow up on what your testimony was.

10 A. Sure.

11 Q. You testified you would also  
12 know about the entity that employs the  
13 Allergan Finance group; is that true?

14 A. To clarify, the Allergan  
15 Finance group that works in the US at  
16 Madison, New Jersey.

17 Q. Okay. Who employs them?

18 A. Allergan Sales, LLC.

19 Q. Okay. Do you know any other  
20 entities who employ individuals who work at  
21 the Madison, New Jersey, location?

22 A. I do not.

23 Q. Approximately how many  
24 employees does Allergan Sales, LLC, have?  
25

A. I do not know.

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1 Q. About how many employees are in  
2 the treasury function of Allergan Sales, LLC?

3 A. Including myself and my admin,  
4 it's eight people in treasury.

5 Q. About how many people are  
6 employed in the finance group in Madison of  
7 Allergan Sales, LLC?

8 A. Well, not -- the finance  
9 function -- who are hired by Allergan Sales,  
10 LLC, is probably somewhere 200 to 200 -- I  
11 would say about 200 people.

12 Q. And you said they were hired by  
13 Allergan Sales, LLC.

14 Can you clarify what you mean,  
15 why you said "hired"?

16 A. Well, they are on the payroll  
17 of Allergan Sales, LLC, so when I get my  
18 check, when I get my W-2 at the end of the  
19 year, it says "Allergan Sales, LLC."

20 Q. You testified before that you  
21 weren't sure whose funds were used when ADP  
22 processed your paycheck.

23 Do you remember that?

24 MS. LEVY: Objection to  
25 mischaracterization.